

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**CAROLYN W. HAFEMAN,**

*Plaintiff,*

**V.**

**LG ELECTRONICS, INC.,**

***Defendant.***

**CIVIL ACTION 6:21-CV-00696-ADA**

## JURY TRIAL DEMANDED

**NOTICE CONCERNING VENUE DISCOVERY**

TO THE HONORABLE COURT:

Defendant LG Electronics, Inc. (“Defendant”) submits this Notice that Plaintiff’s First Amended Complaint (Dkt. 35) has mooted Defendant’s Motion to Dismiss Pursuant to Rule 12(b)(3), or in the Alternative to Transfer Venue Pursuant to 28 U.S.C. § 1406(a), and Motion to Dismiss Contributory Infringement Claims Pursuant to Rule 12(b)(6) (“Motion to Dismiss,” Dkt. 24). *See Argent Holdings, LLC v. E. El Paso Physicians Med. Ctr.*, No. EP-17-CV-00199-ATB, 2018 WL 548676, at \*3 (W.D. Tex. Jan. 23, 2018) (“[T]he filing of an amended complaint moots motions to dismiss). The First Amended Complaint dropped LG Electronics U.S.A., Inc. as a defendant, obviating the issue of improper venue raised in the Motion to Dismiss. Given that the Motion to Dismiss has been mooted and Defendant does not challenge venue as improper for itself, Defendant understands that there is no cause to conduct venue discovery.

Date: December 9, 2021

Respectfully submitted,

By: /s/ Barry K. Shelton

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this filing via the Court's CM/ECF system per Local Rule CV-5(a) on December 9, 2021.

/s/ Barry K. Shelton  
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